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January 13, 2021

By ECF

Hon. Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *U.S. v. Angela Myers, 19 Cr. 789 (PGG)*

Dear Judge Gardephe:

I write with the consent of the government and U.S. Pretrial Officer Lea Harmon, to respectfully request a modification of the terms and conditions of Ms. Myers' bail to permit her to reside in Stroudsburg, PA, and Brooklyn, NY, thereby extending her permissible districts of travel to include Pennsylvania. Ms. Myers has secured a residence in Stroudsburg, PA but will alternate between her Brooklyn home and the Pennsylvania home weekly because her children are enrolled in school in Brooklyn. Additionally, the children's father resides in Brooklyn and it is necessary that they continue to have a relationship with him.

The home address in Pennsylvania was provided to pretrial officer Lea Harmon. Ms. Myers will continue to abide by all other bail conditions. Thank you for your consideration to this request.

Respectfully,

/s/ N. Todd

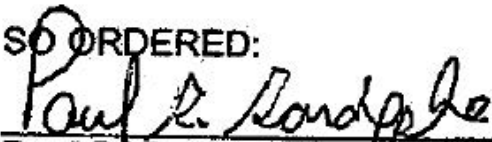
Natali Todd, Esq.  
Attorney for Angela Myers

cc: PTSO Lea Harmon (by email)  
AUSA Mathew Andrews (by email)  
AUSA Louis Pelligrino (by email)

MEMO ENDORSED

The Application is granted.

SO ORDERED:

  
Paul G. Gardephe, U.S.D.J.

Dated: January 20, 2021